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8 UNITED STATES DISTRICT COURT FOR THE
 9 NORTHERN DISTRICT OF CALIFORNIA

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11 PERDANA CAPITAL (LABUAN) INC., a)
 Malaysian Corporation,)
 12)
 Plaintiff,)

CASE NO. CV 09-01479 RS
 Assigned to Hon. Richard Seeborg

13

v.

**STIPULATION AND ~~PROPOSED~~
 ORDER REGARDING THE
 DISCLOSURE AND DISCOVERY OF
 EXPERT WITNESS OPINIONS**

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MOHAMMAD AKRAM CHOWDRY, an)
 Individual; HI-TECH VENTURE PARTNERS,)
 15 LLC, a Delaware Limited Liability Company;)
 HI-TECH ASSOCIATES, LLC, a California)
 16 Limited Liability Company; and DOES 1-50,)

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Defendants.)

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1 IT IS HEREBY AGREED AND STIPULATED by the parties hereto, by and through
2 their respective attorneys that are authorized to enter into this stipulation, that section 3, titled
3 "EXPERT WITNESSES," of the Case Management Scheduling Order dated March 7, 2011 shall
4 be amended as follows for the following reasons:

5 WHEREAS, on June 28, 2011, the parties filed a joint letter with Magistrate Judge Spero
6 raising a number of issues related to discovery in this case;

7 WHEREAS, on July 25, 2011 Magistrate Judge Cousins signed the parties' Stipulation
8 and Order Regarding Discovery Disputes ("Order") to resolve the issues raised in the June 28,
9 2011 letter to Judge Spero;

10 WHEREAS, since the entry of the Order, the parties have been attempting to complete
11 the discovery required under the Order;

12 WHEREAS, due to the delay in completing discovery the experts do not have all of the
13 information they need to draft their respective expert opinions;

14 NOW, THEREFORE, IT IS HEREBY STIPULATED, AGREED AND
15 RESPECTFULLY REQUESTED by the undersigned Parties, that section 3, titled "EXPERT
16 WITNESSES," of the Case Management Scheduling Order dated March 7, 2011 shall be
17 amended as follows:

18 3. EXPERT WITNESSES, The disclosure of expert witness opinions shall proceed
19 as follows:

20 A. On or before January 10, 2012, plaintiff shall disclose expert testimony and
21 reports in accordance with Federal Rule of Civil Procedure 26(a)(2).

22 B. On or before February 7, 2012, defendants shall disclose expert testimony and
23 reports in accordance with Federal Rule of Civil Procedure 26(a)(2).

24 C. On or before March 20, 2012, all discovery of expert witnesses pursuant to
25 Federal Rule of Civil Procedure 26(b)(4) shall be completed.

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IT IS SO STIPULATED AND RESPECTFULLY REQUESTED.

Dated: October 25, 2011

Respectfully submitted,

LAW OFFICES OF MICHAEL Q. EAGAN

By: _____ /s/
THOMAS H. MANULKIN

Attorneys for defendants Mohammad Akram Chowdry, Hi-Tech Venture Partners, LLC and Hi-Tech Associates, LLC

Dated: October 25, 2011

Respectfully submitted,

KAUFMAN DOLOWICH VOLUCK & GONZO

By: _____ /s/
JOSEPH KOURI
JOSEPH J. DE HOPE, JR.

Attorneys for plaintiff Perdana Capital (Labaun), Inc.

I, Thomas H. Manulkin, of the Law Offices of Michael Q. Eagan, whose ID and password are being used to file this Stipulation and [Proposed] Order, hereby, attest, in accordance with General Order 45 X(B), that Joseph J. De Hope, Jr. of Kaufman Dolowich Voluck and Gonzo, LLP has concurred in this filing.

Dated: October 25, 2011

Respectfully submitted,

LAW OFFICES OF MICHAEL Q. EAGAN

By: _____ /s/
THOMAS H. MANULKIN

Attorneys for defendants Mohammad Akram Chowdry, Hi-Tech Venture Partners, LLC and Hi-Tech Associates, LLC

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PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated: 10/25, 2011

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA



THE HON. RICHARD SEEBORG
UNITED STATES DISTRICT JUDGE